

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of:	)	
	)	
Petition of Somos, Inc. for a Declaratory	)	WC Docket 95-155
Ruling Regarding Registration of	)	
Text-Enabled Toll Free Numbers	)	WT Docket No. 08-7
	)	

**Comments in Support**

ATL Communications hereby submits these comments in response to the Federal Communications Commission's ("Commission") November 4, 2016, Public Notice, seeking comments regarding the above-captioned matter.

ATL Communications is the largest independent Resp Org of Toll Free numbers. We are a third party number administrator for carriers and end users in Canada and the USA. We manage millions of numbers for our customers and we represent our customers' interests in toll free numbers. We are in full support of this Petition so the SOMOS TSS Registry can bring creditability and oversight to the activation of text enabled toll free numbers.

We believe in the value of text enabled toll free but have been sitting on the sidelines waiting for the market to find clarity by providing a reliable and secure way for numbers to be activated and the messages to be delivered. After many discussions with SOMOS and our customers we firmly believe that the only responsible path forward is for SOMOS to provide that level of reliability and security and to ensure Resp Org authority over its assigned toll free numbers.

In the current market, vendors not only compete with ATL directly but also activate numbers on our Resp Org without authorization from us or our customers of record and

intercepts the text messages for marketing and sales purposes. SOMOS, as a nonprofit administrator of the SMS/800 database doesn't compete with ATL and has no commercial interest in intercepting any messages.

When the end user customer of record on a toll free number picks a third party Resp Org that customer is expecting the Resp Org to be the agent and manage the number(s) soup to nuts. The Resp Org is the contact between the customer and the market of other Resp Org's and Carriers. The Resp Org is the entity responsible for controlling/provisioning the toll free numbers and the only one authorized to do so. The FCC has already designated these responsibilities to Resp Orgs so this should not differ and should include any non-voice related services such as texting when using that same toll free number.

We have had dozens and dozens of situations where the numbers that we manage on our Resp Org were text enabled without our knowledge or authorization and without the knowledge or authorization from our customer of record. Customers only found out and notified us when a toll free texting vendor contacted them with the totals of texts their toll free number was receiving – the only way to know that was to intercept the messages. This creates uncertainty and distrust in the marketplace.

The most reliable way to ensure that toll free numbers are text-enabled only with proper authorization is to request that the messaging provider inform and obtain the authorization of the Resp Org who then can confirm with the end user customer of record to close the authorization loop and ensure that the messages are properly being delivered, nobody else is intercepting/hijacking those text messages and all routing data within the SMS/800 database is properly linked to the messages to ensure that the messages end up with the correct party.

SOMOS's TSS Registry provides functionality that addresses these concerns by the following:

- When a messaging provider seeks to text-enable a number, it registers the number and enters the necessary routing information into the database.
- The TSS Registry then determines whether the Toll-Free number is reserved in the SMS/800 database and the identity of the Resp Org responsible for the number
- The TSS Registry sends an automated notification e-mail to the Resp Org, which can access the TSS Registry to approve the request.
- Routing information from the TSS Registry is available to any routing database provider without charge and is available in a completely neutral basis.

ATL is already using the TSS Registry and using it has significantly increased our ability to protect our end-user customers from losing control of services offered via their Toll-Free number. The TSS registry is needed to ensure the integrity of the toll free numbering system is preserved and the FCC's rules regarding toll free number assignment is respected.

SOMOS is the trusted neutral third-party of the SMS/800 database and the only one that can provide neutral administration for text enabled toll free and bring stability to the marketplace and does not compete with Resp Orgs. Addressing this petition does not require the FCC to resolve the regulatory status of text-messaging for other purposes or to address existing arrangements for routing of text to toll free messages.

ATL is hopeful that the FCC will declare SOMOS and the TSS Registry the required registry for text enabled toll free.

Respectfully submitted,  
Brian Lynott, President  
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